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Return Date: March 29, 2001
Time: 10:00 AM

Attorneys for Chinatrust Bank (U.S.A.) and Chinatrust Commercial Bank (New York Branch)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
: Case Nos. 00-41065
RANDALL'S ISLAND FAMILY : through 00-41196 (SMB)
GOLF CENTERS, INC., et al., :
: (Jointly Administered)
Debtors. :
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**NOTICE OF MOTION COMPELLING PAYMENT OF THE LIENS OF
SECURED CREDITORS CHINATRUST BANK (U.S.A.) AND CHINATRUST
COMMERCIAL BANK (NEW YORK BRANCH) AND COMPELLING THE
RULE 2004 EXAMINATIONS OF JONATHAN HACKER AND PHILIP J. GUND
BY CHINATRUST COMMERCIAL BANK (NEW YORK BRANCH)**

TO: All parties and counsel of record on the attached Affidavit of Service

PLEASE TAKE NOTICE that on March 29, 2001, Chinatrust Bank (U.S.A.) and Chinatrust Commercial Bank (New York Agency) will seek an order of this Court: (1) compelling immediate payment on the value of their liens; (2) requesting all interest earned on those payments; and (3) compelling the immediate Rule 2004 depositions of Jonathan Hacker, Esq. and Philip J. Gund by Chinatrust Commercial Bank (New York Branch).

In support of this motion, Movants will rely on the memorandum of law attached.

A proposed form of Order is attached.

Respectfully submitted,

WONG ♦ FLEMING, P.C.

Attorneys for Chinatrust Bank (U.S.A.) and
Chinatrust Commercial Bank (New York Branch)

By /s/ James K. Haney
James K. Haney (JH-2539)

Dated: March 16, 2001
Edison, New Jersey